

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(1) CARLOS Baskerville 55,267 :
(Name of Plaintiff) (Inmate Number) :

(Address) :

(2) _____ :
(Name of Plaintiff) (Inmate Number) :

(Address) :

(Each named party must be numbered,
and all names must be printed or typed)

vs.

CIVIL COMPLAINT

(1) WARDEN Dominick DeRose :

(2) Dr Young Prime Care :

(3) Dauphin County Prison :
(Names of Defendants) :

(Each named party must be numbered,
and all names must be printed or typed)

FILED
HARRISBURG, PA

JAN 28 2015

[Signature]

TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS
_____ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

None

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes ☐ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ Yes ☐ No
- C. If your answer to "B" is Yes:
1. What steps did you take? I've written grievances; spoke to medical staff about my blood results.
 2. What was the result? I haven't received any response from my grievances, Medical said I needed permission from Prime Care
- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS

- (1) Name of first defendant: Dr. Young / Prime Care
- Employed as Doctor at Dauphin County Prison
- Mailing address: 501 Mall Road
- (2) Name of second defendant: WARDEN Dominick DeRose
- Employed as Warden at Dauphin County Prison
- Mailing address: 501 Mall Road
- (3) Name of third defendant: Dauphin County Prison
- Employed as _____ at _____
- Mailing address: _____

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. During the whole time of my condition Dr. Young gave me inadequate medical treatment. Medical was deliberately indifferent to my serious medical needs. I suffered irreparable harm, because of medical negligence. This medical

2. I Feel that the Warden is liable, because he makes the decisions in Dauphin County Prison, which lead up to my near death experience. After the doctor who handled my case found out my diagnosis which is a disease called myasthenia gravis. I went into a stage of the
3. disease which is called myasthenic crisis. I was in intensive care unit for at least 5 days. I don't remember anything for 3 of the days because of heart failure; breathing stopped. While I was unconscious of everything around me; on a ventilator to help me breath, I've gotten a

V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I would like the court to award me damages in the amount of 150,000 dollars from each defendant in their individual capacity; official capacity for punitive damages; compensatory damages; monetary damages.
2. I would like to have access to complete professional medical care by a specialist whos' experience can help me with my treatment.
3. I can't expound enough of the importance of having some kind of medical coverage to would afford me the medical care aforementioned

Continuation from Page 2 (Defendants)

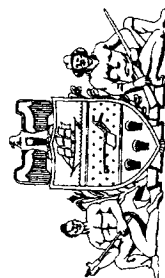
treatment constituted cruel and unusual punishment, and violated my Eighth Amendment Right under the United States Constitution. Medical also forged my name to the Welfare office for medical benefits without consent from me or us talking about any type of care for me. Instead of Prime Care paying for my care while I'm in Dauphin County Prison Care, they (Prime Care) committed perjury.

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procedure done to me which is called plasmapheresis which cleans the bad antibodies out of my to help me move again. I was given 2 sessions out of 5 which was not good because I was cleared to go back to the prison still in bad shape. After being back in the jail for a month I was rushed to Penn State Hershey, because of the disease had gotten bad again. I had no follow ups from Harrisburg Hospital. After being in Penn State Hershey for 20 days with getting different treatments nothing was working, but after the doctors gave me 6 plasmapheresis treatments there was a turn around. After me speaking to the doctor at Hershey, she said that Harrisburg was suppose to give me all 5 plasmapheresis treatments. It's evident that Harrisburg hospital was totally negligent with my follow up care, my life was totally being disregarded whether for financial reason or security reason feels don't fabricate. My body was totally decapitated unable to function, how do I begin to explain the shock of a man my age being totally incapable of moving. However shocking that was, it can't compare with the stresses of knowing my medical care is inadequate, mentally ravishing me in a way I can't begin to explain. As I write these facts down about my case, it's a reminder of how powerless I am physically mentally and emotionally. I ask for empathy from medical staff who seems to be morbid and uncaring, unethical would be to light of a word. I am not a disrespectful man; and I do appreciate Hershey medical center for saving my life literally. I just need to feel like my life has meaning to other people involved in my treatment, and most important be sure I have adequate medical care. Going through these before I was diagnosed with Myasthenia Gravis I had to force my dad off of work

visit me to see how the jail was neglecting me as I fell at my visit, had no control of neck muscles, hand functions was gone, vision I couldn't see, I couldn't speak, in other words the superiors over seeing the jail & the medical department neglected me in a way that you shouldn't treat any living being. Sgt Switzer who is part of the E.M.T told the shift commander that I had to leave because there was something really wrong with me. Dad had to raise hell and threaten to go to the news, because he didn't really recognize me as his son. At this stage my Aftercare has been inconsistent, my medication is delivered in a untimely manner. My rest is constantly disrupted due to security staff insensitivity to my condition. Also I must be allowed access to medical attention expeditiously which is impossible so it seems, I've been neglected.

problems with



Stephen E. Farina
Dauphin County Prothonotary
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Harrisburg, PA 17101

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UNITED STATES MIDDLE DISTRICT COURT
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